

MUF HANNEMANN  
MAYOR

DEPARTMENT OF TRANSPORTATION SERVICES  
**CITY AND COUNTY OF HONOLULU**  
650 SOUTH KING STREET, 3RD FLOOR  
HONOLULU, HAWAII 96813  
Phone: (808) 768-8305 • Fax: (808) 768-4730 • Internet: www.honolulu.gov

WAYNE Y. YOSHIOKA  
DIRECTOR

SHARON ANN THOM  
DEPUTY DIRECTOR



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May 21, 2010

RT2/09-298754R

Ms. Katherine Kupukaa  
95-685 Makaunulau Street  
Mililani, Hawaii 96789

Dear Ms. Kupukaa:

Subject: Honolulu High-Capacity Transit Corridor Project  
Comments Received on the Draft Environmental Impact Statement

The U.S. Department of Transportation Federal Transit Administration (FTA) and the City and County of Honolulu Department of Transportation Services (DTS) issued a Draft Environmental Impact Statement (EIS) for the Honolulu High-Capacity Transit Corridor Project. This letter is in response to substantive comments received on the Draft EIS during the comment period, which concluded on February 6, 2009. The Final EIS identifies the Airport Alternative as the Project and is the focus of this document. The selection of the Airport Alternative as the Preferred Alternative was made by the City to comply with the National Environmental Policy Act (NEPA) regulations that state that the Final EIS shall identify the Preferred Alternative (23 CFR § 771.125 (a)(1)). This selection was based on consideration of the benefits of each alternative studied in the Draft EIS, public and agency comments on the Draft EIS, and City Council action under Resolution 08-261 identifying the Airport Alternative as the Project to be the focus of the Final EIS. The selection is described in Chapter 2 of the Final EIS. The Final EIS also includes additional information and analyses, as well as minor revisions to the Project that were made to address comments received from agencies and the public on the Draft EIS. The following paragraphs address [your](#) comments regarding the above-referenced submittal:

1. Concern about travel lanes removal

*The number of traffic lanes along Kamehameha Highway in Pearl City (three lanes in each direction) will remain the same before and after construction of the fixed guideway. During construction, one lane may be temporarily closed during peak-travel periods and additional lanes may be temporarily closed during off-peak travel periods. Construction-related procedures that may require temporary road closures are described in Section 3.5.3 Construction-related Effects on Traffic in of the Final EIS.*

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Travel lanes will not be taken away along Dillingham Boulevard as a result of the Project. As shown in Tables 3-9 and 3-10, roadway conditions on Dillingham Boulevard will improve as a result of the Project.

The modeling conducted for the Draft and Final EISs considered all roadway projects listed in the Oahu Regional Transportation Plan (ORTP), including a Nimitz Flyover and mitigation measures on the H-1 Freeway. Table 2-4 in the Final EIS lists committed projects from the ORTP that were included in all modeling results. As shown in Tables 3-9 and 3-10 in the Final EIS, roadway conditions will improve with the Project.

## 2. Concern about adequate demand and ridership for the Project

As shown in Table 3-18 in the Final EIS, transit ridership will be 44 percent higher with the Project compared to the No Build Alternative. This includes ridership on the guideway as well as TheBus.

As identified in the Section 3.2.1 on Analytical Tools and Data Sources of the Final EIS, transit ridership forecasts for rail and bus service are based on a travel demand forecasting model used by the Oahu Metropolitan Transportation Organization (OahuMPO) for the Oahu Regional Transportation Plan. The OahuMPO model is based on “best practices” for urban travel models in the U.S. and is consistent with guidance consultation from with FTA. As indicated in the Final EIS, this modeling approach has been effective in estimating ridership levels in other areas such as Los Angeles County, Salt Lake City, and the Denver region in the last 10 years.

The travel demand forecasting model has been refined since the Draft EIS was published by adding an updated air passenger model (which forecasts travel in the corridor related to passengers arriving or departing at Honolulu International Airport), defining more realistic drive access modes to project stations, and recognizing a more robust off-peak non-home-based direct-demand element (trips that do not originate at home) based on Honolulu travel surveys in Honolulu. The Final EIS reflects updated ridership numbers resulting from model refinement.

The Project is one of the first in the country to design and undertake an uncertainty analysis of this type of travel forecast. The uncertainty analysis evaluates the variability of the forecast by establishing likely upper and lower limits of ridership projections. FTA has worked closely with the City during this effort. A variety of factors were considered in the uncertainty analysis. Given the factors considered, the anticipated limits for guideway ridership in 2030 are expected to be between 105,000 to 130,000 trips per day, bracketing the official forecast of 116,000 riders a day used for all calculations. Currently, there are over 250,000 boardings per day on buses.

## 3. Concern about congestion

As shown in Table 3-14 in the Final EIS, the Project will reduce congestion (as measured by vehicle hours of delay) by 18 percent compared to the No Build Alternative. Tables 3-9 and 3-10 in the Final EIS show an improvement in vehicles per hour on Kamehameha Highway during both the a.m. and p.m. peak hour.

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**Comment [fc1]:** Is there a particular  
citation to include?

**Comment [KMC2R1]:** Change made  
consistent with conference call on  
May 24<sup>th</sup>

**Comment [fc3]:** Consider rephrasing.

**Comment [KMC4R3]:** Added text  
explaining the term

**Comment [fc5]:** It might be helpful to  
include a figure about current bus  
ridership to provide context  
understanding the ridership volume  
and to illustrate how the rail  
project fits in.

**Comment [KMC6R5]:** Text added

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~~Travel lanes will not be taken away along Dillingham Boulevard as a result of the Project. As shown in Tables 3-9 and 3-10, roadway conditions on Dillingham Boulevard will improve as a result of the Project. As shown in Table 3-18 in the Final EIS, transit ridership will be 44 percent higher with the Project compared to the No-Build Alternative. This includes ridership on the guideway as well as TheBus. The modeling conducted for the Draft and Final EISs considered all roadway projects listed in the Oahu Regional Transportation Plan (ORTP), including a Nimitz Flyover and mitigation measures on the H-1 Freeway. Table 2-4 in the Final EIS lists committed projects from the ORTP that were included in all modeling results. As shown in Tables 3-9 and 3-10 in the Final EIS, roadway conditions will improve with the Project. The Project responds to unmet demand for transit infrastructure that accommodates current residents and visitors and anticipates future demographic trends. The challenge is to reconcile the need to provide a public transportation system that is safe, accessible, and convenient while preserving aspects of the community that are integral to its character and values. This project will enable the City to concentrate growth in existing urbanized and adjacent areas on Oahu in the decades to come. By reducing the overall number of vehicle miles traveled through expanded public transportation, DTS and FTA are promoting environmental sustainability, congestion reduction, and increased mobility for a diverse population, which will improve the overall quality of life for the majority of Honolulu residents and visitors.~~

The FTA and DTS appreciate your interest in the Project. The Final EIS, a copy of which is included in the enclosed DVD, has been issued in conjunction with the distribution of this letter. Issuance of the Record of Decision under NEPA and acceptance of the Final EIS by the Governor of the State of Hawaii are the next anticipated actions ~~and will conclude the environmental review process for this Project.~~

Very truly yours,

WAYNE Y. YOSHIOKA  
Director

Enclosure